

**UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF WISCONSIN**

---

**In Re: Lee D. Mork, Jr.,  
Debtor**

**Chapter 13  
Case No. 18-12962-CJF**

---

**OBJECTION TO THE TRUSTEE'S MOTION TO DISMISS**

---

Debtor, Lee D. Mork, Jr., by his attorneys of Debt Advisors, S.C., hereby objects to the Motion to Dismiss and represents as follows:

1. Debtor filed his Chapter 13 Bankruptcy on August 29, 2018.
2. Trustee Mark Harring has filed a Motion to Dismiss for failure to file a Modified Plan to make up suspended payments.
3. Debtor does not dispute the allegations raised in the Trustee's Motion.
4. Debtor has now regained employment, with consistent income.
5. Debtor will provide updated payroll information to the Trustee shortly and consents to an employer wage order.
6. Debtor will modify the Plan to cure any arrears accumulated to date within the next 10 days.

**WHEREFORE**, Debtor requests that the Motion to Dismiss filed by the Trustee be denied or, in the alternative, that a hearing be set in this matter.

Dated this 25<sup>th</sup> day of June, 2019

**DEBT ADVISORS, S.C.**

/s/ Chad L. Schomburg  
Chad L. Schomburg, #1036431

Debt Advisors, S.C.  
2600 N. Mayfair Rd., Suite 700  
Milwaukee, WI 53226  
P: (414) 755-2400  
F: (414) 257-0172